

West Neighbourhood House	
Policy Title:	Privacy
Approved by:	West Neighbourhood House Board of Directors
Approval date:	April 2007
Revision dates:	December 2011 / March 2017 / October 2020 / March 2025

Policy Statement

West Neighbourhood House is committed to protecting the privacy and Personal Information (defined below) of its participants, voting members, volunteers, students, employees, donors and other stakeholders. We value the trust of all of these stakeholders and the public. We recognize that maintaining this trust requires transparent and accountable management of the information that is shared with us.

West Neighbourhood House shall safeguard Personal Information and shall comply with the Personal Information Protection and Electronic Documents Act (PIPEDA), the Personal Health Information Protection Act (PHIPA), Canada’s anti-spam legislation (CASL), and all other applicable legislation.

This Policy is to be read in conjunction with all other applicable West Neighbourhood House policies, including but not limited to: [Code of Conduct](#), [Confidentiality](#), and [Use of Information Technology](#).

Applicability

- Staff
- Students
- Volunteers
- Contractors

Personal Information

“Personal Information” is defined as any information that can, with reasonable foreseeability, be used to distinguish, identify, or contact a specific individual, excluding business contact information.

West Neighbourhood House collects Personal Information in a variety of ways and for a variety of purposes, including when providing services to individuals and conducting communications and fund development activities.

The Personal Information West Neighbourhood House collects includes:

- personal names and contact details (email, address, phone, etc.)
- medical conditions and history

- marital status and history
- services provided to an individual
- age
- employment status and income
- work history and experience
- gender, race or ethnicity

General Principles

West Neighbourhood House shall adopt, implement, and maintain the following principles and procedures to protect the privacy of Personal Information. West Neighbourhood House further shall train staff, volunteers and students on this policy and its contents.

1. Accountability

West Neighbourhood House is responsible for protecting all Personal Information within its control and shall designate a Privacy Officer to oversee the organization's compliance with these principles.

The Privacy Officer must be a staff member of West Neighbourhood House. The Privacy Officer shall be responsible for implementing this Policy, maintaining a comprehensive and current knowledge of West Neighbourhood House operations and privacy laws, and providing privacy training to staff, including communicating details of this Policy to all employees and volunteers.

All employees, volunteers (including board members), students, partner organizations or committee members who collect, process or use Personal Information must comply with this policy.

2. Rationale for Collecting Information

West Neighbourhood House shall ensure that limited collection, use and disclosure and appropriate retention principles are respected in determining when Personal Information is to be collected (see #4 and #5 below).

West Neighbourhood House generally uses Personal Information for purposes including but not limited to:

- providing quality programs and services,
- providing information to third parties for which individuals accessing service have consented (e.g. when making a referral for service),
- responding to an individual's questions and comments,
- contacting individuals about our fundraising, membership and program activities,
- responding to emergency situations (e.g. emergency contact information, program closures, etc.),
- payroll and human resources files.

3. Consent to Collect Personal Information

Any person collecting Personal Information on behalf of West Neighbourhood House shall obtain express or implied consent from the individual, or authorized representative of the individual, whose Personal Information is being collected. Examples of authorized representatives include legal guardians or persons having powers of attorney.

Individuals may withdraw consent for collection, use and disclosure of Personal Information at any time, as permitted by law. If an individual withdraws their consent it is subject to contractual and legal restrictions and reasonable notice. The individual will also be promptly informed of the implications of withdrawing consent.

4. Limits to Collection of Information

The collection of Personal Information is limited to only that information that is necessary for the purpose identified and will be collected by fair and lawful means.

5. Limits to Use, Disclosure and Retention of Personal Information

Personal Information collected shall not be used or disclosed for purposes other than those for which it was collected, except with consent of the individual or as required by law, and any use of Personal Information shall be properly documented.

All Personal Information shall be deleted, erased, or made anonymous no later than seven years after the purpose for which it was collected has been completed, except as required by law.

6. Accuracy

West Neighbourhood House shall ensure, to the extent reasonably practical, that the personal information it collects is accurate, complete, and up to date as is necessary for the purposes for which it is to be used.

7. Safeguards

West Neighbourhood House management and staff shall ensure that security safeguards are implemented to protect Personal Information against loss or theft, and to prevent unauthorized access, disclosure, copying, use, or modification.

8. Openness

West Neighbourhood House will make readily available specific information about its policies and practice relating to the management of Personal Information by posting this Policy and the Privacy Officer contact information on the House website and using other appropriate communications.

9. Individual Access to Personal Information

Upon request, an individual shall be informed of the existence, use, and disclosure of their Personal Information and shall be given access to that information. An individual can challenge the accuracy and completeness of the information and have it amended as appropriate. Requests can be made to the Privacy Officer (privacyofficer@westnh.org).

10. Monitoring Compliance

West Neighbourhood House shall respond to complaints about the policies and practices regarding the handling of Personal Information. The procedure for filing the complaint is outlined in the [West Neighbourhood House Complaints Policy](#).

The Privacy Officer is responsible for monitoring compliance with this policy through regular audits and checks.

11. Notification of Breach of Compliance

The Privacy Officer shall ensure that any breach of compliance, as determined by the Privacy Officer, is immediately communicated to any individual(s) affected as well as the Executive Director or designate, who will advise the Board.

How to reach us:

West Neighbourhood House Privacy Officer Norma Frank can be reached at 416-532-4828 ext. 147 or by email at privacyofficer@westnh.org

Acknowledgement of Policy

I acknowledge that I have received and read the Privacy Policy and have had it explained to me.

I understand that it is my responsibility to abide by this policy and related policies of West Neighbourhood House as a condition of my employment/volunteer status.

Date: _____

Name of Employee/Volunteer: _____

Signature: _____